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County of Los Angeles, Los Angeles County Department of  
Health Services, and Thomas L. Garthwaite, M.D.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

GARY HARRIS, an individual;  
SUSAN HAGGERTY, an individual;  
PING YU, an individual; LUTHER  
RABB, an individual; MEDHAT  
ELSADONI, an individual; DEAN  
LANE, an individual; JOAN  
MOXLEY-BROWN, an individual;  
MARY PHONG, an individual; LOS  
ANGELES COALITION TO END  
HUNGER AND HOMELESSNESS,  
and FAMILIES AIMING TO  
IMPROVE THEIR HEALTHCARE,

Plaintiffs,

v.

BOARD OF SUPERVISORS OF THE  
COUNTY OF LOS ANGELES; LOS  
ANGELES COUNTY DEPARTMENT  
OF HEALTH SERVICES; DR.  
THOMAS GARTHWAITE, Director of  
Department of Health Services; and  
DOES 1 through 100, inclusive,

Defendants.

Case No. CV 03 2008 FMC (PJWx)

**ORDER ON STIPULATION FOR  
ENTRY OF PROTECTIVE ORDER**

Discovery Cutoff: None  
Motion Cutoff: None  
Trial Date: None

[Honorable Florence-Marie Cooper]

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WHEREAS, as of February 4, 2008, the parties entered into a Stipulation for Entry of Protective Order and good cause appearing, the Court orders as follows:

1. Defendants shall permit Plaintiffs' counsel of record as well as Plaintiffs' designated expert(s) access to the Emergency Department Records for the time periods: Fall Quarter 2006 (October through December 2006); and Winter Quarter 2007 (January through March 2007) for the express purpose of conducting an independent audit and review of those records in order to verify the Emergency Department Board Time ("EDBT") reported by LAC+USC Medical Center and confirmed through findings of the County's Auditor Controller. Said access shall be at a time and on a date or dates mutually agreeable to Plaintiffs and Defendants.

2. Because of the confidential nature of the information contained in the Emergency Department Records, Plaintiffs' counsel and their designated expert(s) shall not have the right to copy any of those individual records, but shall be afforded the unrestricted right to view those records and to make notes concerning the information contained in those records. Notes shall not identify patients by name, Social Security number, address or any other individually identifying information.

3. Neither Plaintiffs' counsel nor their expert(s) shall be permitted to disclose the contents of any of the Emergency Department Records to which access is granted under this protective order to any other person.

4. In the event that Plaintiffs' counsel requires the use or disclosure of information contained in the Emergency Department Records for the purpose of litigation, the parties shall execute an additional stipulation for entry of order specifying additional uses and allowable disclosures of such information.

Dated: February 6, 2008



FLORENCE-MARIE COOPER, Judge  
UNITED STATES DISTRICT COURT

**PROOF OF SERVICE**

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 10250 Constellation Boulevard, Nineteenth Floor, Los Angeles, California 90067.

On February 6, 2008, at the direction of a member of the Bar of this Court, I served the within:

**ORDER ON STIPULATION FOR ENTRY OF PROTECTIVE ORDER**

on the interested parties to this action by delivering a copy thereof in a sealed envelope addressed to each of said interested parties at the following address(es):

SEE ATTACHED LIST

☒ (BY MAIL) I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in Los Angeles, California. Service made pursuant to this paragraph, upon motion of a party served, shall be presumed invalid if the postal cancellation date of postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.

☐ (BY OVERNIGHT DELIVERY SERVICE) I served the foregoing document by Federal Express, an express service carrier which provides overnight delivery, as follows. I placed true copies of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed to each interested party as set forth above, with fees for overnight delivery paid or provided for.

☐ (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

☐ (BY FACSIMILE) I caused such documents to be delivered via facsimile to the offices of the addressee(s) at the following facsimile number:

Executed this 5th day of February, 2008, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

ERIKA M. BARBOUR

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